

Exhibit 6

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Mr. George E. Uthe, Investigator
Office of the Chief Disciplinary Counsel
State Bar of Texas
P.O. Box 12487
Austin, Texas 78711

Re: 201805425 – Michael J. Gottlieb – Ty Clevenger

Mr. Uthe:

I write in response to your letter dated September 24, 2018 and in response to Michael Gottlieb's bad-faith allegations. Apparently Mr. Gottlieb is still upset because I publicly mocked his sleazy and unethical conduct in *Aaron Rich v. Edward Butowsky, et al.*, Case No. 1:18-cv-00681 (D.D.C.). See “Why won’t Seth Rich’s brother authorize Wikileaks to tell what it knows?” <http://lawflog.com/?p=1937>. As that blog post explains, Mr. Gottlieb's associate subpoenaed my private communications and my client's private communications *about the subject matter of the lawsuit* from Twitter, never mind attorney-client privilege. *Id.* Mr. Gottlieb was publicly embarrassed, as he should have been, and now he wants to get even.

Not surprisingly, Mr. Gottlieb omitted the evidence that refutes his accusations. He complains about alleged inadequacies in my application for *pro hac vice* admission, yet he failed to include the application itself. I have enclosed it as Exhibit 1, and you will note that my application originally was *unopposed*. After I exposed Mr. Gottlieb's misconduct, however, he retaliated by filing his untimely objection to my application.

I would particularly direct your attention to Edward Butowsky's reply (Exhibit 2) to Mr. Gottlieb's untimely objection. In his grievance, Mr. Gottlieb complained about that reply and alleged that I filed it for an improper purpose, yet he once again omitted the actual document from his grievance exhibits. Why? For starters, because it was not filed by me, but by attorney Ken Martin. Furthermore, and more importantly, the reply eviscerates nearly every argument that Mr. Gottlieb made in his grievance (therefore I incorporate it by reference).

Mr. Gottlieb and his co-counsel were so embarrassed by the facts in the reply that they later tried to convince Mr. Butowsky to stipulate to striking it from the record. See July 3, 2018 email correspondence (Exhibit 3). Mr. Butowsky refused, and Mr. Gottlieb

and his associate wisely refrained from filing their frivolous motion to strike, because it only would have drawn the judge's attention to their misconduct.

Instead of learning from that experience, however, Mr. Gottlieb made the same bad-faith allegations (*e.g.*, accusing me of anti-Semitism)¹ all over again in his grievance, then he withheld the document that would show that he knew his accusations were false. Contrary to his allegations, I withheld nothing from the D.C. court. As you can see in my declaration in support of the *pro hac* application (Exhibit 4), I directed the court's attention to its own Attorney Grievance Docket No. 15-19. I have attached a letter (Exhibit 5) that I sent yesterday to the D.C. court, asking it to permit OCDC and the New York committee on character and fitness to see the entire file from Docket No. 15-19. That file contains all of the matters that Mr. Gottlieb accused me of withholding, ergo I did not hide anything.

Only one of Mr. Gottlieb's allegations is not addressed in the aforementioned reply, and that is the allegation that I attempted to practice law in D.C. The August 20, 2018 email string that he attached to his grievance refutes his allegation. Mr. Gottlieb falsely suggested that I was acting on behalf of Mr. Butowsky in the D.C. case when in reality I was asking questions for my blog and for FOIA litigation that was pending in New York (where I am appearing *pro se*). I was not acting on behalf of Mr. Butowsky, and I never attempted to practice law in D.C. without proper authorization.

Mr. Gottlieb's grievance is meritless, and he knew that when he filed it. I request that it be dismissed immediately.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ty Clevenger', with a stylized, flowing script.

Ty Clevenger

cc: Michael Gottlieb

¹ The reply (Exhibit 5) conclusively demonstrates that “shyster” is not an anti-Semitic slur. Furthermore, I did not know that Mr. Gottlieb or his associate were Jewish until he mentioned it *after* the blog post. The fact that Mr. Gottlieb keeps recycling this vile accusation is further proof of his malice and bad faith.